

04/12/2006

1087499 - R8 SDMS



"Wilson, David"  
<David.Wilson@Pacifcorp.com>  
m>

04/12/2006 09:31 AM

To MDeLORETTO@uta.cog.ut.us, sgreene@sg-assoc.com

cc "Jenkins, Michael" <Michael.Jenkins@Pacifcorp.com>,  
Joyce Ackerman/EPR/R8/USEPA/US@EPA

bcc

Subject FW: TPSS - UP&L property

Mary,

When PacifiCorp excavated to remove Libby Amphibole asbestos (LA) contamination from the portion of its 147 South 400 West, Salt Lake City, Utah property occupied by Utah Transit Authority (UTA) for one of its light rail rectifier substations, it surpassed the United States Environmental Protection Agency (EPA) specified clearance level. PacifiCorp was required to reach a level of no detectable LA in the top one foot of soil. If the entire top foot contained LA, then PacifiCorp was required to continue excavating until it reached a level of less than one percent (1%) LA in the soil. In fact, in all areas excavated and cleared by EPA, residual levels were less than 0.2% LA in the soil.

Of significance, there were areas that PacifiCorp excavated outside of the UTA property where it could not reach clearance levels due to a variety of reasons, such as the LA lay under energized, high voltage electrical equipment. In areas where clearance was not reached, PacifiCorp was required to provide warning to anyone who might, in the future, dig into the remaining LA contamination. In these locations, PacifiCorp laid down barriers of heavy, bright orange plastic. Anyone digging into the plastic would know immediately to stop and implement proper precautions to protect workers and the public. PacifiCorp also wrote an institutional control procedure for these areas. None of these areas are inside, or even near the fenceline on the outside of UTA's substation.

Such warnings were not required in areas that were cleaned to, or beyond, EPA's specified clearance level. Neither were institutional controls required. Again, UTA's entire substation, plus all areas for a substantial distance outside UTA's fenceline were cleaned beyond EPA's clearance level. That no warning barrier was required at the interface between unexcavated soils and the clean fill introduced to replace excavated soils would indicate that no change in excavation procedure need be implemented merely for passing from the replaced fill into the unexcavated soils.

What I have stated above should not be taken as affirmation of absence of any form of contamination, LA or other, in unexcavated soils. Excavation should proceed with the same due care employed elsewhere. I also do not in any way imply the need, or lack thereof, of any form of personal protective equipment (PPE) for UTA workers.

**David Wilson, PE**  
**(503) 813-6635**

**From:** DeLoretto, Mary (Environmental Studies Manager) [mailto:MDeLORETTO@uta.cog.ut.us]  
**Sent:** Wednesday, April 05, 2006 2:49 PM  
**To:** Wilson, David; Ackerman.Joyce@epamail.epa.gov  
**Cc:** sgreene@sg-assoc.com  
**Subject:** FW: TPSS - UP&L property

Joyce and Dave,

Attached is a figure showing where UTA will need to excavate and the depths to which we will excavate at our Traction Power Substation (TPSS) in downtown Salt Lake City. This is part of our light rail transit extension project. Please review and let us know if there is potential to encounter asbestos-contaminated soils at these depths/locations, and if so, what environmental and safety precautions we will need to take.

Please feel free to call me if you have any questions. We would like to begin construction in this area this summer.

Thanks,

Mary

*Mary DeLoretto, P.E.  
Environmental Studies Manager  
Utah Transit Authority  
3600 South 700 West  
Salt Lake City, UT 84119  
801-287-2558 (office)  
801-915-5438 (mobile)*

-----Original Message-----

**From:** Greene, Steve [mailto:Steve.Greene@parsons.com]

**Sent:** Wednesday, April 05, 2006 2:21 PM

**To:** DeLoretto, Mary (Environmental Studies Manager)

**Cc:** Nixon, Evan; Cox, Kevin (Project Control); Provost, Todd (System Engineer); Benson, Ron (Manager Of Maintenance Of Way); sgreene@sg-assoc.com

**Subject:** TPSS

Mary,

Per our discussion, please find attached a sketch of the work anticipated in UTA's TPSS site located at 150 South 400 West. Please review this and let us know of any precautions needed to install these facilities.

If you have any questions, please do not hesitate to contact me at your convenience.

Thanks



Steve tpss1.pdf